

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
SOUTHERN DIVISION**

Timothy J. Donohue, )  
Plaintiff, )  
vs. )  
Arthur J. Gallagher & Co., a Delaware )  
Corporation; and Bob Jacobsen )  
Defendants. )  
Case No. 4:22-CV-04044-KES  
**SUPPLEMENTAL  
DECLARATION  
OF HAL A. SHILLINGSTAD**

I, Hal Shillingstad, declare as follows:

1. I am an attorney with the law firm of Ogletree, Deakins, Nash, Smoak & Stewart, P.C. I represent Defendants Arthur J. Gallagher & Co. (“AJG”) and Bob Jacobsen in the above-referenced matter.

2. I make this Declaration in Opposition to Plaintiff's Motion for Partial Summary Judgment filed on July 7, 2022 and in Support of Defendants' Motion for Partial Summary Judgment filed on July 28, 2022.

3. Attached hereto as Exhibit A is a true and accurate copy of excerpts from the transcript of the deposition of Plaintiff Timothy J. Donohue, taken September 14, 2022. Portions of the excerpts not relevant to the facts at issue are redacted.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 16, 2022

/s/Hal A. Shillingstad  
Hal Shillingstad